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9 **UNITED STATES DISTRICT COURT**

10 **DISTRICT OF NEVADA**

11 SONALOLITA WILSON

12 CASE NO.: 2:18-CV-01241-JCM-NJK

13 Plaintiff

vs.

14 UNITED STATES OF AMERICA ;  
15 LICETH DEMHA-SANTIAGO; JUAN  
16 DEMHA; DOES I THROUGH X; AND  
ROE CORPORATIONS 1 THROUGH X,

17 Defendants.

18 **ALL RELATED MATTERS**

19 **STIPULATION AND  
ORDER TO CONTINUE TRIAL (FIRST  
REQUEST)**

20 Pursuant to LR IA 6-1, the parties, by and through their respective counsel of record,  
21 hereby stipulate and request that this Court continue trial in the above-captioned matter to  
22 accommodate a private mediation with Ret. Judge Jennifer Togliatti on February 22, 2023.

23 **A. Reasons For the Continuance**

24 The parties have been discussing the potential for alternative resolution prior to trial. The  
25 case was not referred for a settlement conference in front of a United States Magistrate Judge as  
26 seems to be the usual course following the filing of a Proposed Joint Pre-Trial Order. As such, the  
27 parties discussed other alternative routes to resolution outside of trial.

1       Recently, the United States of America received approval and agreed to participate in  
2 private mediation with Ret. Judge Jennifer Togliatti, with stipulations. Before agreeing to and  
3 receiving authority to engage in a private mediation the following circumstances had to be  
4 overcome. First, the U.S. Attorney's Office currently only has three AUSAs and three unfilled  
5 AUSA positions in the relatively small defensive section of the Civil Division. Second, but  
6 relatedly, during the past few months, undersigned defense counsel have been busy in  
7 particular with written and deposition discovery, motion practice, hearings, and settlement  
8 conferences, responding to new complaints, and getting up to speed with additional cases  
9 and deadlines in cases the undersigned have taken over after other AUSAs left the office.  
10 Third, the Deputy Civil Chief for the Defensive Section of the Civil Division departed. This  
11 departure required additional time for the undersigned AUSAs to recommend to and receive  
12 approval from management at the U.S Attorney's Office to mediate the case. And finally, the  
13 U.S. Attorney's Office encountered funding issues due to the end of the Federal  
14 Government's fiscal year; there are typically several weeks during September–October during  
15 which the office cannot obligate funds for such things as retaining an expert or private  
16 mediator. Once the foregoing issues were overcome, the United States was able to agree to  
17 participate in a private mediation as described above. However, the soonest that Judge Togliatti  
18 has available to mediate this case is February 22, 2023. The parties have already reserved said  
19 date, pending a continuance of trial, which is set for January 23, 2023.

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1 *Re: Wilson v. United States of America, et al.*  
2 2:18-CV-01241-JCM-NJK  
3 [Proposed] Stipulation and Order to Continue Trial (First Request)

4 IT IS SO ORDERED that the trial currently set for January 23, 2023 be continued to  
5 **April 10, 2023, at 9:00 a.m.**; and the Calendar Call currently set for January 18, 2023, at 1:30  
6 p.m., be continued to **April 5, 2023, at 1:30 p.m.**

7 **ORDER**  
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10 DATED November 21, 2022.  
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14 UNITED STATES DISTRICT JUDGE